

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

HIRSH MOHINDRA, et al.

No. 17 CR 442

Judge Elaine E. Bucklo

**MOTION FOR ENTRY OF AGREED  
PROTECTIVE ORDER GOVERNING DISCOVERY**

Pursuant to Fed. R. Crim. P. 16(d), the United States of America, by JOEL R. LEVIN, Acting United States Attorney for the Northern District of Illinois, moves for the entry of an agreed protective order, and in support thereof states as follows:

1. The indictment in this case charges defendants with wire fraud, in violation of Title 18, United States Code, Section 1343.
2. The discovery to be provided by the government in this case includes sensitive information, whose unrestricted dissemination could adversely affect law enforcement interests and the privacy interests of third parties.
3. The government has discussed the proposed protective order with counsel for defendants, who agree to the entry of the proposed order.

WHEREFORE, the government respectfully moves this Court to enter the proposed protective order.

Respectfully submitted,

JOEL R. LEVIN  
Acting United States Attorney

By: /s/ Renai S. Rodney  
RENAI S. RODNEY  
Assistant U.S. Attorney  
219 South Dearborn St., Rm. 500  
Chicago, Illinois 60604  
(312) 353-4064